



May 30, 2013

FPPC Request for Information
SEI Form 700 Electronic Filing Solution

Fair Political Practices Commission
Final Version

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IMPORTANT INFORMATION – PLEASE READ BEFORE RESPONDING TO THIS RFI

The Fair Political Practices Commission (FPPC) will not reimburse vendors for any costs associated with responding to this RFI. The FPPC has no obligation to buy or issue solicitation to any vendor as a result of this RFI. Information provided in response to this RFI will not be considered when evaluating bidders responding to any future procurement.

RFI INFORMATION

Posting date 06/24/2013.

Response due date 07/11/2013.

Response address:

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Email questions to:

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INTRODUCTION

The Fair Political Practices Commission (FPPC) was created by the Political Reform Act of 1974 (Act), as an independent non-partisan agency whose objective is to prevent corruption of public officials in the governmental decision making process. The FPPC regulates and enforces actions performed by governmental officials and agencies and requires extensive disclosure reports so that the public has access to government processes.

The Act requires, at no cost, to prescribe reporting on the Form 700, Statement of Economic Interests, of public officials' personal financial interests, and to make the forms available to the public. The purpose of the Form 700 is two-fold:

1. It provides necessary information to the public about a public official's personal financial interests so there is assurance that officials are making decisions that do not enhance their personal finances;
- and,
2. It serves as a reminder to the public official of potential conflicts of interests so the official can recuse from making or participating in governmental decisions that are deemed conflicts. In short, the Form 700 provides transparency to ensure accountability.

The FPPC is the agency charged with administration and enforcement of the Form 700 reporting requirements for all state and local agencies and filers. Pursuant to Section 87500.2 which took effect on September 24, 2012, the FPPC is the agency mandated to approve and certify electronic filing systems proposed by agencies. To date, the FPPC has certified 23 state and local agencies to utilize electronic filing systems. This provision also requires the FPPC to accept electronic copies of Form 700s forwarded by agencies that have received electronically filed statements. There is a crucial need for a consistent and uniform electronic filing system to receive these electronically filed statements. Because the FPPC has no system in place to receive the statements, the electronically filed Form 700s have to be manually processed under our current paper filing system.

In addition, Form 700s are posted on the FPPC's website for all legislators, judges, county boards of supervisors, mayors and city councilmembers. Prior to posting on our website, the forms have to be manually scanned, and certain information (such as addresses and signatures) has to be manually redacted from the forms. It is a very labor intensive and costly program.

The number of requests by the public to view for Form 700 filings continues to escalate each year. The FPPC is mandated to provide access to Form 700s no later than the second business day after receiving the forms. Moving to an electronic filing system would provide optimal benefits to the public and the press in promoting transparency and easier access Form 700s. Today, when the FPPC receives a request for Form 700s, staff must manually retrieve the forms from our file room, make copies and either provide hard copies or email the copies to the requestor.

Business Need

The FPPC requires a turnkey solution that allows it to provide current and future filers the ability to electronically file the SEI form 700. Ideally the solution will be open source so as to allow interested parties to take part in future development and expansion. The solution selected will meet the following broad provisions;

- Replaces the current antiquated paper reporting and filing system.
- Adds an updated search component that better meets the public need and centralizes information allowing **immediate** data retrieval for both officials and the public.
- Replaces and improves the current data management system that has been in place since 2000.
- Allows filers to have easier access to rules regarding filing, ability to store multi-year data in self-populating fields, and flagging of common errors before filing

The FPPC has been unable to verify the number of Form 700s filed throughout the state because most statements are filed with local agencies. However, the FPPC receives and processes approximately 25,000 statements each year and staff estimates that 500,000 statements could be filed throughout the state each year.

An electronic filing solution should provide a significant cost savings to the state by eliminating the current personnel hours spent manually data entering SEI information into a data base for each employee that files a Form 700, and providing public access to paper filings. It should also practically eliminate the sending of correspondence and enforcement referrals for inadvertent errors on a statement, saving substantial personnel hours. The system proposed will also eliminate duplicative processes at other agencies resulting in further cost savings. It is also hoped that the system will give the agency the future capability to track fines related payments made directly to the general fund, FPPC) or through e-commerce.

By eliminating the current labor intensive decentralized reporting system and implementing a centralized web-based system, state and local agencies will experience cost reductions; the public will

have an easier and a more meaningful way to analyze data in real time; and compliance with the Act will improve.

Current Practices

Section 87500 requires the following high level state and local public officials to file the Form 700 with the FPPC: constitutional officers, legislators, CalPERS and CalSTRS board members, Board of Equalization members, Fair Political Practices Commissioners, Coastal Commissioners, Public Utility Commissioners, Energy Commissioners, High Speed Rail Commissioners, Judges and Court Commissioners, County Boards of Supervisors, County Counsels, District Attorneys, Mayors, City Councilmembers, County and City Treasurers, and County and City Planning Commissioners all file Form 700s with the FPPC. In addition, the FPPC receives statements for all state agency heads and boards and commissions, legislative staff members, as well as statements from certain multi-county agencies. Yearly, over 20,000 individuals file Form 700s with the FPPC and such individuals constantly change as new persons assume office into high level management positions in state and local government.

In addition, Section 87500 requires filing officers to forward copies of Form 700s filed for all state boards, commissions and similar multimember bodies to the FPPC unless the conflict-of-interest code for the agency already requires forwarding the original statements to FPPC. Most agencies scan the forms into PDF documents, and email them to a special FPPC mailbox set up to receive statements. However, it is a duplicative process as agencies must comply with their internal processing requirements and remember to forward statements to FPPC within five days of the due date or date filed. The FPPC must then log the statements and ensure they are organized and available for public access. We receive over 1,500 copies of Form 700s for state boards and commissions forwarded under this provision each year. Often we receive scanned and hard copies of the same filing.

Section 81010 requires specific duties for the FPPC to carry out in administering the forms filed. The FPPC currently has one full time Staff Services Manager, six budgeted full time Staff Services Analysts fully dedicated to performing the required management duties. Form 700 statement processing includes the following:

Manually opening mail, sorting and date stamping statements

The majority of the 25,000 statements the FPPC receives are during the peak annual filing period of February through the end of April. Most statements are received through the mail which requires manually opening the mail, date stamping forms, and sorting forms.

Not all forms are received in the mail. Starting in 2013, officials in agencies with approved electronic filing programs which have filers that are required to file Form 700s with the FPPC are simply emailing FPPC copies of PDF forms. However, we must continue to manually process them into our current database as the FPPC has no method to store and track Form 700s sent through email. In some instances, the agencies are also forwarding a second hard copy which results in staff processing two forms rather than one form per filer.

Organizing and logging statements

In order to efficiently provide access to statements, they have to be organized by variables such as classification, agency name, filer and position.

The current database requires manual data entry. Each filer and each Form 700 has specific data that is entered. The database also must keep current with agency contact information. And as noted below, the database is programmed to generate a number of reports that ensure compliance with the law. Keeping the database current with the proper filers and filings and filing officials is a challenge in a paper driven model. One example is that often employees do not complete fields relating to their specific agency and FPPC staff must perform queries to ensure that the statement is associated with the correct individual on the list.

Managing non-filers

The law requires that the FPPC ensure that all required Form 700s are filed on time. Once all annual statements are logged, staff generates reports to determine the names of those who have not filed. Significant time is spent manually researching the accuracy of the reports as there is a high degree of potential system errors, and staff does not want to send an erroneous request for a statement. Staff makes a series of contacts: two written notices, one or two telephone calls, and email, if available, to request the statement. This process was reviewed and approved by the five-member FPPC Commission and is the guiding procedure for all agencies.

Reviewing statements

The law requires FPPC to perform a simple review on all statements and a detailed review on 20 percent of statements filed, and on all late statements. The facial review consists of making sure the statement contains an original signature (except for efiled statements), and that all schedules indicated as attached to the Form 700 on the cover sheet are included with the filing. An electronic system will eliminate this requirement by staff as a statement cannot be filed without the basic completed fields. FPPC must perform a detailed review on all assuming office statements and on all late statements where we audit the actual schedules and notify filers if there are discrepancies. For example, if a filer reports

an investment, but does not indicate the fair market value, or if the filer reports disposal of real property, but does not report income, we must generate a letter to the filer requesting an amendment. The time to process an amendment letter varies by the information that must be requested but it is safe to say that a letter takes at least 20 minutes of staff time to 30-45 minutes if the statement has multiple issues to be addressed.

Assessing late filing penalties

The FPPC is responsible for enforcing and assessing fines on late statements. Filers may provide a written explanation for late filings and request a waiver of the late filing penalties. Generally this process requires FPPC staff to send one or two letters or emails and the filer to do the same before a fine may be assessed and closed. The date and amount of fines paid are logged, and staff also compares the checks received to the Administration Division log to ensure there are checks and balances in our accounting system.

FTB Referral Program

If the fines are not collected via the paper notification, we refer individuals to the Franchise Tax Board for collection of fines through the Tax Intercept Program. If an individual has tax refunds or lottery winnings available, those funds are intercepted and transferred to the FPPC then FPPC staff makes necessary documentation and forwards the payment to the State general fund to pay the fines owed. FPPC staff must complete forms and monitor the FTB referral program. Once a fine is intercepted, the payment is logged into the database.

Enforcement referrals

When a filer does not file, we are mandated by the Act to refer the individual to our Enforcement Division. Under our current system, a form is manually completed with all of the applicable contact information for both the filer and the filing official, and a paper file is manually created that includes copies of all correspondence, phone and email records, prior filing history, and a copy of the last statement filed. Manual monitoring is performed until the statement is filed or until Enforcement takes another action.

Filing Form 700s

All paper forms are retained onsite in the FPPC's office. After the forms are logged and reviewed, they are filed alphabetically in specified areas of the file room by classification (constitutional officers, legislature, legislative candidates, legislative staff, state, court, county, city, and multi-county), by agency name, and by statement year. When a filer files an amendment to a statement that has already

been filed, the statement has to be manually retrieved from the file room, and the amendment is attached to the filing and rescanned and redacted, if applicable.

Forms retention

The PRA requires statements for constitutional officers to be retained forever, and all other statements to be retained for seven years. After the retention periods elapse, the forms are recycled. Each fall, staff must manually go through the file folders, pull each filer's Form 700 to ensure it is over seven years old, and recycle the paper filings. This process is very labor intensive and takes many hours to complete.

Form 700 access

A basic premise of the Act is to provide unfettered public access to Form 700s to maximize transparency for all of California officials' Form 700 disclosure statements. Specifically, Section 81008 states that no conditions whatsoever may be placed on persons desiring to inspect or reproduce reports, nor shall any information or identification be required from these persons. Form 700s must be available no later than the second business day after they are received. If copies are requested, agencies cannot charge more than 10 cents per page, and may charge a \$5 retrieval fee, per request, for statements five or more years old. Because of this statutory provision, Form 700s are not subject to the Public Records Request requirements.

Despite our ongoing efforts to educate state and local agencies about the public access rules in Section 81008, every year we must answer a significant number of calls from members of the public and press stating that they were asked to identify themselves, give a reason for access, or complete a form as a condition for access to statements. In some instances, they are told there is a waiting period for management approval to gain access to the forms. In these cases, staff contacts the agency (often taking a couple of phone calls) to educate the agency staff and ensure that the forms are made available to the public.

Since inception of the Act in 1974, the FPPC has always dedicated significant staff resources towards educational efforts to ensure that this component of the law is upheld, and as the filing officer for more than 25,000 statements filed per year and located in our offices, we always ensure that Form 700s requests receive the highest priority in handling. For the past several years, we have seen a marked increase in the amount of forms requested. For example, a comparison of requests for statements during the 2010 and 2012 election years revealed a 25 percent increase in the number of pages copied--despite the posting of more statements on our website.

Public portal

The Commission approved a website posting policy in 2010 (Regulation 18313.5), requiring PDF versions of Form 700s for elected officials to be available on the Commission's website. The address and signatures must be redacted from the Form 700 Cover Page and on amendment schedules. Because of limited staff resources, a phased posting approach was implemented: In 2010, 2009 annual Form 700s for constitutional officers, Board of Equalization members, legislators and county boards of supervisors were posted; in 2011 postings were added for FPPC Commissioners, city councilmembers and mayors; and in 2012 postings for judges were added.

In 2012, the Commission approved Regulation 18313.6 which requires the FPPC to redact additional information requested by an official. A benefit of the PDF forms is the public can search for information reported on the forms, but the redaction process is extremely labor intensive as described below. Currently any viewer may access the FPPC webpage and view a PDF version of the Form 700 of the selected officials identified above. In addition, a limited search function is also available. There is no data mapping or graphic illustrations available to the public.

FPPC Form 700 Posting Process

The FPPC posts PDF copies of Form 700s for constitutional officers, legislators, judges, members of the board of supervisors, mayors, and city council members on its website. The signature and address on the Cover Page of the Form 700 and on amendments is always redacted, and the filer may request additional redaction of addresses and names reported on actual schedules to protect privacy interests.

Prior to posting, the FPPC must scan the paper forms one at a time into PDF documents, name the documents, redact information, apply optical character recognition (OCR) software to forms to make them searchable, and save them to an electronic folder. In instances where filers request address or other information to be redacted due to privacy concerns, this information must be manually redacted from Form 700 schedules and double checked by the filer and FPPC staff before the forms are posted.

Note: Manual redaction requests can take triple the time to process because the previously posted form must be compared with the request for redaction; manual redaction must be applied and saved; and the redacted statement must be checked to ensure accuracy before posting. We expect to receive additional redaction requests in the future as more statements are available electronically.

Preparation of Filers to Statement for Posting

An Excel spreadsheet must be prepared and maintained which lists the names of the filers and the PDF file name so that the PDF forms are properly labeled and posted on our website. The spreadsheet must continue to be maintained to reflect updated information because officials leave and assume office on an ongoing basis.

Essentially, every statement that is posted must be manually entered into a spreadsheet. In subsequent years, each filer is reviewed to ensure that the individual is holding office and the FPPC must post the statement.

The FPPC IT Division must code the documents and post them to a test site. Technical Assistance Division staff then checks the PDF links to make sure they display properly prior to the live postings of the Form 700s on our website. This is a crucial step because if naming the PDF document and the spreadsheet information are off by only one character, the PDF document will not post and a broken link error will display which requires backtracking to figure out and correct the error. In 2012 and prior years, the FPPC has hired student interns to perform the scanning and redaction duties. In 2013, the FPPC is contracting with an outside vendor to perform these services.

Form 700 Paper Copy Requests

The Act requires FPPC to provide access to all Form 700s no later than the second business day after they are received during our regular business hours. Most Form 700s are requested via phone or email, and copies are either mailed or scanned and emailed to requestors. However, we do receive some requests from walk-ins at our public counter. Unless we receive an extremely large request, most requests are completed either that same day or within 24 hours. To respond to a request, we must pull the hard copy of the Form 700 from the file room, remove any correspondence, and either make a copy for requestors, or scan the form for emailing to the requestor, and re-file the original statement in the file room.

Most requestors do not request a single copy of a Form 700. When requests are made, a significant percentage of requestors ask for more than one statement per filer (i.e. all statements we have on file for John Doe which could be up to seven years of statements), or they ask for all statements for a group of filers (i.e. annual statements for all planning commissioners in a particular county). Each year, it is common for filers to contact either the FPPC or their filing official for a copy of their prior year form as a reference for completing the current Form 700.

During 2012, we received requests for over 5,500 copies Form 700s. In addition, during 2013, we have received an increase of requests for statements from state and local filing officials who forgot to retain

copies for their records. The law requires filing officials to retain copies so they can make statements available for public access purposes in their offices.

Filing official education

Except for statements filed by retired judges and legislative staff members, the FPPC relies on intermediary filing liaisons (filing officials) to notify filers and gather forms for Form 700 filers from state and local government agencies and provide updates to FPPC on filers who assume and leave office. Significant time is spent in educating these liaisons on their duties, and following up on the status of statements via email and telephone contacts. Each year, every agency is required to review a FPPC-generated list of active officials, and notify FPPC of changes to this list. It is common for the filing official to forget to obtain statements during the year from officials who have left office or are newly hired. Frequently, there is high turnover in which individuals perform these duties from year to year which requires significant training efforts as to which forms are forwarded to the FPPC; who has assumed and left office; the status of forwarding statements to the FPPC; and the rules concerning the due dates on forms. The FPPC works with over 1,500 filing officials.

Form 700 updates

The Form 700 is revised and approved by the FPPC Commissioners each year to comply with legislative and regulatory changes. FPPC staff must review all instructions, FAQs, examples, the Reference Pamphlet and the forms to ensure accuracy. This also must be done in a very short time period, to have the Form 700 and related materials ready to post by January 1 of the next year. In addition, electronic filing vendors need the revised forms and related materials so they have time to update systems for their customers. Vendors continuing ask for the changes earlier but legislative changes are usually not known until late October and must be incorporated by mid-November to meet public meeting notice requirements. The Commission must have all the changes incorporated and ready for use by January 1 of each year.

Form 700 filing process

Currently, filers must file paper Form 700s with their agencies unless they are filing under an approved electronic filing system. The filing official makes and retains a copy and mails originals of Form 700s specified above to the FPPC. The Act requires filing officials to retain these copies for four years to ensure public access.

A designated filing official for each agency provides either a hard copy of the Form 700 or a link to the interactive Form 700 on the FPPC's website for filers to manually complete the form, unless they are using an approving electronic filing system. Many filers do not save their Form 700s each year as they

must have the higher level Adobe software available in order to save the forms. Only statements filed by legislative staffers and retired judges are not filed with a filing official.

For the last several years, the FPPC has made an Excel version of the Form 700 schedules available, which is very helpful for some filers as they can easily save information such as the stocks reported. Because of the nature of the form, the Excel version is not always user friendly, and can be difficult to read when printed.

An electronic filing system will eliminate the need for separate versions of the forms and this duplicative procedure. Currently, the FPPC receives over 600 statements from officials that file with one of the twenty-three agencies that have an approved electronic program.

Requirements Overview

The Statement of Economic Interests (Form 700) is the disclosure form prescribed by the FPPC for public officials to report their personal financial interests (investments, real property, income (including gifts, loans and travel payments) and business positions). The FPPC currently receives 25,000 statements per year. Staff estimates there could be over 500,000 Form 700 filers in state and local government agencies. The Form 700 is filed upon assuming office, annually, and upon leaving office. Candidates for elected positions also must file Form 700s. The FPPC seeks to issue this RFI to solicit vendors for solutions on transitioning from a paper filing system to an electronic system for filing Form 700s, providing public access to Form 700s through a public portal, and a data management system to administer the forms for both FPPC staff and the filing official for each agency. The scope of work for any offered solution will meet all of the requirements in this section.

Technical

The end result of this effort is to be an electronic filing system that can be utilized by the FPPC for current filers with the scalability to accommodate additional filers in future years as the FPPC expands its online filing program with the eventual goal of being able to offer its use to all California Form 700 filers. Although not required there is a strong preference for solutions to be open source to allow other agencies to benefit from, and add to, the success of this system.

Security Requirements

Per GC 87500.2 the solution "...shall utilize an electronic filing system that includes layered security to ensure data integrity. The system shall have the capability to uniquely identify a filer electronically when

he or she accesses the electronic filing system. The operational process for the system shall include industry best practices to ensure that the security and integrity of the data and information contained in the statement of economic interests are not jeopardized or compromised.”

Per Regulation 18756(b) “...In addition to the requirements set forth in Section 87500.2, an agency's electronic filing system for statements of economic interests shall include the necessary industry best practices to ensure that the integrity of the data and information is not jeopardized or compromised by using technology such as secured authentication, complex password requirements, secure sockets layer (SSL), Web encryption, enterprise-level network firewalls, database encryption, password encryption, system hardening procedures, a backup and restore process, disaster recovery capability, and the capability to completely redact or omit information from an Internet posting of the form.”

Records Retention

SEI's for purposes of retention fall into two categories; Statements that must be retained forever and Statements that must be deleted in 7 years (amount of time subject to change but will remain uniform throughout the category). The retention category of the statement is determined by the position of the filer. The number of positions that require permanent retention is significantly smaller.

Redaction

Although the system will be dealing with public documents there is a requirement for electronically posted forms to have redaction options available for filers. Redacted information cannot be displayed on the public facing elements of the system. Access to the complete un-redacted information must be available on the internal facing elements of the system. Solution will include a mechanism for filers to request a given field be redacted.

Professional Services

Training for FPPC technical and program staff must be included in the solution, as well as a plan for ongoing professional services required to maintain and update the system once it is released to production. Training resources, such as instructional videos and/or manuals for filers and the agency filing officials will be required.

Migration

A migration plan for the current filer information is not required; however some method for FPPC staff to either manually enter or import filers will be needed.

Password Management

Proposed systems will be required to have secure automated password recovery tools accessible to filers.

Application Compatibility

Proposed systems will be required to have a plan to allow users to import CSV files generated by the FPPC Gift Tracking application. This feature should be a user initiated upload.

Open Source

Although not required there is a strong preference for solutions to be open source to allow other agencies to benefit from, and add to, the success of this system

Filer Support

Proposed system should include a mechanism to reject entries that do not comply with established parameters, and ideally a prompt to educate on filing rules and sources related to each required entry field. Additionally, information should be retained in the system so the filer does not have to re-enter identical data the subsequent filing year.

Disaster Recovery

Proposed systems will include a mechanism of recovery that will allow the system to be up and accessible within two hours of a non ISP related outage.

Business

The following requirements are only a summary of the major design and structure components required for a fully automated system. Because the law sets different deadlines and different filing rules among state and local officials, the database must be programmed to address all the various requirements and rules related to the filings as well as to be flexible enough to make changes due to future statutory revisions. It requires extensive programming to ensure that statements are properly associated to an official and his/her agency or agencies; correspondence can be sent efficiently; fines paid; enforcement processes met; and public access and redaction procedures are in place.

SEI- Form 700

1. Auto-population of data from previous filing – FPPC will provide set fields to auto-populate.
2. FPPC instructions must be provided along with help aides in a rollover/hover environment.
3. Filer must be able to print the Form 700 for personal use without instructions.
4. Filer must be able to save the Form 700 before submission.
5. The submission form template must have mandatory fields and validations.
6. Filer may not file a Form 700 until the filing official has added the filer to the database.
7. Auto-populate the first Form 700 filed by the filer with the assuming office date or election year along with filer's name, agency and position.
8. Auto-populate the leaving office date that is entered by the filing official.
9. Revise instructions each year.
10. Revise field headings, add fields, or delete fields each year.
11. Make major revisions, such as adding a new schedule with new fields.

Database Management

1. The database must identify a filer with certain data fields.
2. Each filer must be identified with an agency.
3. Each filer is identified through a structured table (e.g. class, agency, position).
4. Each filer is identified with a single unique identification number.
5. Certain notifications are recorded in the filer history.
6. Fine information fields are recorded in the filer history.
7. Enforcement fields are recorded in the filer history.
8. Access to each Form 700 filed and relevant date, type of statement.
9. Database is structured so that it distinguishes between filers that are currently filing SEIs and filers that no longer file Form 700s.
10. Database is structured so that a filer can be associated with more than one agency (expanded statements).
11. The database must program certain flags and business rules to ensure compliance with statutory provisions related to the filing of a Form 700. Dates must be programmed to determine when a Form 700 is due and late. Due dates vary by agency, filer and position, statement type and the filing of an assuming office statement. (For example: Filers who assume office between October 1 and December 31 do not have to file an annual statement until the following year. Filers who leave office between January 1 and the due date for the annual filing may combine their annual and leaving office filings so long as they file by the earliest due date. Candidate statement due dates are tied to election document filings.)

Reports

The FPPC will need to be able to generate standard reports based on a number of criteria. Sample reports can be provided upon request.

Filing Officials

1. Over 1,500 different agencies submit Form 700s for filing with the FPPC. Each of these agencies will have one or two filing officials that must be able to access the database for their unique filers to add, update and delete information. In addition, county elections officials must have access to the database to enter the candidates seeking state office.
2. Filer cannot be added to the database without an assuming office date or election year.
3. FPPC and filing official may not delete filer if a Form 700 has been filed by the filer. If a filer has filed an FPPC form due to an error on the part of a filing official, the form cannot be deleted but saved in a manner that is different than those filers who are required to file with the FPPC. For example, if a filing officer enters names of people who should not file, but the individuals do file, a record of the filing must be maintained. The law requires that the FPPC cannot delete a filing, so how miss-filed statements are handled needs to be addressed.
4. Specific rights will be outlined for filing officials, the FPPC and users. For example, certain notifications can be sent by the filing officials and FPPC while other notifications may only be sent by FPPC.

Notifications

1. Provision for blast emails to filing officials (example: reminder that filers must be notified of upcoming filing deadlines.)
2. Provision for blast emails to certain classes of filers (example: notification to all city attorneys about new law changes.)
3. Nonfiler, fine and amendment request letters to filers. These letters would either be canned letters with certain information (such as due dates) auto-populated or customized letters. Mailing systems for electronic and postal delivery is required.

Fine Management

1. Tracking and logging system for fines owed, due dates, date and amount received in filer history, This will include functionality that allows the FPPC or Filing officers to add notes in an easily identifiable section
2. Tracking system for Franchise Tax Board fine referrals - includes date referred and amount and date intercept is transferred to the State General Fund. The intercept date and amount also recorded in the filer history indicating payment made.

Enforcement Referral Management

1. Email referral form template to Enforcement that auto-populates with filer information, filing history, filing official contact information, and type of referral (non filer, gift violation).
2. Tracking system for status of enforcement referrals (date referral made and date case closed recorded in filer history).

Accessibility Requirements

Proposed systems must meet all state and federal accessibility requirements for impaired users as detailed in section 508 of the Rehabilitation Act and Title II of the Americans with Disabilities Act and California Government Code 11135.

Public Reporting and Search Functionality

The public portal must contain functionality that allows the public to access the information using both canned and ad-hoc searches. Additionally the public will need to be able to download the data contained in the posted SEI statements in a usable format (i.e. .csv). All information available to the public must maintain the same redaction as the posted material.

Response

If you are interested in responding to this request for information, please send responses to Carol Bollard by 5:00PM PST, July 11, 2013 via standard mail: 428 J St, Suite 620, Sacramento, CA 95814

Response Format

Below is a list of mandatory requirements for the SEI form 700 electronic filing system. Please check either yes or no to indicate your solution meets each requirement. FPPC may not consider any product or solution that does not meet all of the listed requirements. Additional narrative and documentation to explain how your solution meets these requirements should be included in the response. We also request that you provide any product specifications, literature, or any other documentation that substantiates that your product meets these requirements. Responses should be prepared in a manner that delivers a clear, concise delineation of capabilities that show the solutions ability to meet the requirements listed in this RFI. All submittals and accompanying documents become property of the Fair Political Practices Commission.

Response Format

Responses will give total cost of the solution; costs can be based on the current amount of FPPC filers (25,000) and should include the formula for determining costs for growth. All costs to be incurred by the FPPC will be summarized in the following categories.

1. One Time Costs
2. Recurring Costs and the unit(s) per cost (i.e. per filer, per processor, etc.)
3. Other Costs
4. Ongoing Service/Maintenance Costs
5. Total cost of ownership (5 year period)

Requirements Matrix

Security

Yes	No	
		<i>Meets Layered Network Security guidelines</i>
		<i>Uses Secured Authentication</i>
		<i>Uses Complex Passwords</i>
		<i>Has automated Password Recovery system</i>

SEI- Form 700

Yes	No	
		<i>Auto-population of data from previous filing – FPPC will provide set fields to auto-populate.</i>
		<i>FPPC instructions must be provided along with help aides in a rollover/hover environment.</i>
		<i>Filer must be able to print the Form 700 for personal use without instructions.</i>
		<i>Filer must be able to save the Form 700 before submission.</i>
		<i>The submission form template must have mandatory fields and validations.</i>
		<i>Filer may not file a Form 700 until the filing official has added the filer to the database.</i>
		<i>Auto-populate the first Form 700 filed by the filer with the assuming office date or election year along with filer's name, agency and position.</i>
		<i>Auto-populate the leaving office date that is entered by the filing official.</i>
		<i>Revise instructions each year.</i>
		<i>Revise field headings, add fields, or delete fields each year.</i>
		<i>Make major revisions, such as adding a new schedule with new fields.</i>

Database Management

Yes	No	
		<i>The database must identify a filer with certain data fields.</i>
		<i>Each filer must be identified with an agency.</i>
		<i>Each filer is identified through a structured table (e.g. class, agency, position).</i>
		<i>Each filer is identified with a single unique identification number.</i>
		<i>Certain notifications are recorded in the filer history.</i>
		<i>Fine information fields are recorded in the filer history.</i>
		<i>Enforcement fields are recorded in the filer history.</i>
		<i>Access to each Form 700 filed and relevant date, type of statement.</i>
		<i>Database is structured so that it distinguishes between filers that are currently filing SEIs and filers that no longer file Form 700s.</i>
		<i>Database is structured so that a filer can be associated with more than one agency (expanded statements).</i>
		<i>The database must program certain flags and business rules to ensure compliance with statutory provisions related to the filing of a Form 700. Dates must be programmed to determine when a Form 700 is due and late. Due dates vary by agency, filer and position, statement type and the filing of an assuming office statement.</i>

Reports

Yes	No	
		<i>Ability for FPPC to run premade reports</i>
		<i>Ability for FPPC personnel to generate new reports types</i>

Filing Official Functionality

Yes	No	
		<i>Over 1,500 different agencies submit Form 700s for filing with the FPPC. Each of these agencies will have one or two filing officials that must be able to access the database for their unique filers to add, update and delete information. In addition, county elections officials must have access to the database to enter the candidates seeking state office.</i>
		<i>Filer cannot be added to the database without an assuming office date or election year.</i>
		<i>FPPC and filing official may not delete filer if a Form 700 has been filed by the filer. If a filer has filed an FPPC form due to an error on the part of a filing official, the form cannot be deleted but saved in a manner that is different than those filers who are required to file with the FPPC. For example, if a filing officer enters names of people who should not file, but the individuals do file, a record of the filing must be maintained. The law requires that the FPPC cannot delete a filing, so how miss-filed statements are handled needs to be addressed.</i>
		<i>Specific rights will be outlined for filing officials, the FPPC and users. For example, certain notifications can be sent by the filing officials and FPPC while other notifications may only be sent by FPPC.</i>

Notifications

Yes	No	
		<i>Provision for blast emails to filing officials (example: reminder that filers must be notified of upcoming filing deadlines.)</i>
		<i>Provision for blast emails to certain classes of filers (example: notification to all city attorneys about new law changes.)</i>
		<i>Nonfiler, fine and amendment request letters to filers. These letters would either be canned letters with certain information (such as due dates) auto-populated or customized letters.</i>

Fine Management

Yes	No	
		<i>Tracking and logging system for fines owed, due dates, date and amount received in filer history, This will include functionality that allows the FPPC or Filing officers to add notes in an easily identifiable section.</i>
		<i>Tracking system for Franchise Tax Board fine referrals - includes date referred and amount and date intercept is transferred to the State General Fund. The intercept date and amount also recorded in the filer history indicating payment made.</i>

Enforcement Referral Management

Yes	No	
		<i>Email referral form template to Enforcement that auto-populates with filer information, filing history, filing official contact information, and type of referral (non filer, gift violation).</i>
		<i>Tracking system for status of enforcement referrals (date referral made and date case closed recorded in filer history).</i>

Public Reporting and Search Functionality

Yes	No	
		<i>Allows public to run pre-configured canned reports</i>
		<i>Allows public to perform ad-hoc searches</i>
		<i>Restricts all redacted information</i>

Records Retention

Yes	No	
		<i>Retention and auto-deletion capability for forms with arbitrary deletion date (currently 7 years)</i>
		<i>Permanent retention capability for records that require permanent retention</i>

Professional Services

Yes	No	
		<i>Program staff training and documentation</i>
		<i>IT Training, documentation and handoff</i>
		<i>Plan for revision of forms and instructions if no built in revision functionality</i>

Disaster Recovery

Yes	No	
		<i>Full recovery within 2 hours of non ISP related outage</i>
		<i>Backups across the wire to offsite location</i>

Application Compatibility

Yes	No	
		<i>Proposed systems will be required to have a plan to allow users to import CSV files generated by the FPPC Gift Tracking application. This feature should be a user initiated upload.</i>

Redaction

Yes	No	
		<i>Requirement for electronically posted forms to have redaction options available for filers.</i>

Migration

Yes	No	
		<i>Method for adding or importing users</i>

Accessibility Requirements

Yes	No	
		<i>Proposed systems must meet all state and federal accessibility requirements for impaired users as detailed in section 508 of the Rehabilitation Act and Title II of the Americans with Disabilities Act and California Government Code 11135.</i>